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Lynelle J. Slivinski (LS 1210)
**OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.**
521 5th Avenue, Suite 1700
New York, New York 10175
(212) 292-4314
lynelle.slivinski@ogletreedeakins.com

Attorneys for Defendants
Schwartzberg Associates, LLC, and
Cypress Administrative Services, LLC

FILED
U.S. DISTRICT COURT
2008 FEB - 7 P 1:47
S.D. OF N.Y. W.P.

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MICHELE CARUSO,

Plaintiff,

v.

SCHWARTZBERG COMPANIES,
SCHWARTZBERG ASSOCIATES, LLC,
and TAMARAC ADMINISTRATIVE
SERVICES, LLC,

Defendants.

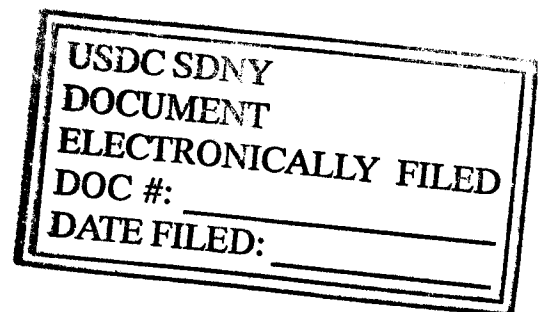
Hon. Stephen C. Robinson, U.S.D.J.
Case No. 7:08-cv-00206-SCR

Civil Action

**NOTICE OF MOTION TO ADMIT
BRIAN D. LEE, ESQ., *PRO HAC VICE*
PURSUANT TO LOCAL RULE 1.3(c)**

TO: David S. Halsband, Esq.
Halsband Law Offices
39 Hudson Street, 4th Floor
Hackensack, New Jersey 07601
Co-Counsel for Plaintiff

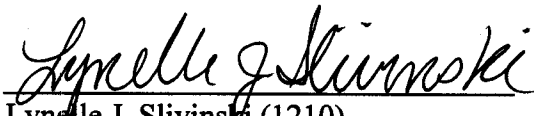
Michael Tsang, Esq.
Tsang Law Firm, P.C.
14 Wall Street, 22nd Floor
New York, New York 10005
Co-Counsel for Plaintiff



COUNSEL:

PLEASE TAKE NOTICE that on a date to be scheduled by the United States District Court for the Southern District of New York, defendants Schwartzberg Associates, LLC and Cypress Administrative Services, LLC (improperly referred to by its former name Tamarac Administrative Services, LLC) shall move for an Order admitting Brian D. Lee, Esq., as a visiting attorney *pro hac vice* to participate in all proceedings relative to the above-captioned matter.

PLEASE TAKE FURTHER NOTICE that in support of this application, defendants shall rely upon the accompanying Affidavits of Brian D. Lee, Esq., and Lynelle J. Slivinski, Esq. A proposed form of Order is being concurrently submitted.

By: 
Lynelle J. Slivinski (1210)

Dated: February 6, 2008

Lynelle J. Slivinski (LS 1210)
**OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.**
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Attorneys for Defendants
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and TAMARAC ADMINISTRATIVE
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Defendants.

: Hon. Stephen C. Robinson, U.S.D.J.
: Case No. 7:08-cv-00206-SCR

: *Civil Action*

: **AFFIDAVIT OF BRIAN D. LEE, ESQ.,**
: **IN SUPPORT OF MOTION FOR**
: **ADMISSION *PRO HAC VICE***

BRIAN D. LEE, ESQ., being of full age, avers and states as follows:

1. I am a shareholder in the law firm of Ogletree, Deakins, Nash, Smoak & Stewart, P.C. I submit this Affidavit in support of my application for permission to appear *pro hac vice* on behalf of the defendants Schwartzberg Associates, LLC and Cypress Administrative Services, LLC (improperly referred to by its former name Tamarac Administrative Services, LLC) in the above-captioned matter.

2. I represent defendants in the above-captioned matter along with Lynelle J. Slivinski, of counsel with the law firm of Ogletree, Deakins, Nash, Smoak & Stewart, P.C. and a member in good standing of the bar of this Court.

3. This is an employment discrimination case. Defendants have requested that I assist Ms. Slivinski in this matter because of my general experience in employment law.

4. I received my law degree from Seton Hall University School of Law.

5. I am a member in good standing of the bars of the States of New Jersey and Pennsylvania, and am admitted to practice before all levels of the New Jersey and Pennsylvania state courts. *See* Exhibits A and B.


6. I am also admitted to and a member in good standing of the United States District Courts for the District of New Jersey, the Eastern District of Pennsylvania, the Middle District of Pennsylvania, and the Eastern District of Michigan.

7. I am not under suspension, disbarment, or any other discipline or disciplinary procedure of any Court.

8. If admitted *pro hac vice*, I will conduct myself as an attorney of this Court uprightly and according to the law, and I will support and defend the Constitution of the United States.

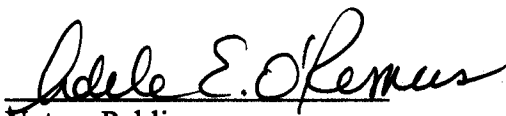
9. Accordingly, for the foregoing reasons, I respectfully request to be admitted as a visiting attorney *pro hac vice* to participate in all proceedings relative to the above-captioned matter.

I hereby aver that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Brian D. Lee

Sworn to and subscribed
before me this 6th day
of February 2008



Notary Public

Adele E. O'Remus
Notary Public of New Jersey
My Commission Expires March 31, 2010

Supreme Court of New Jersey

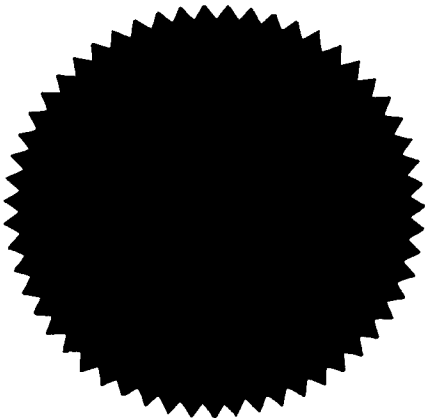


Certificate of Good Standing

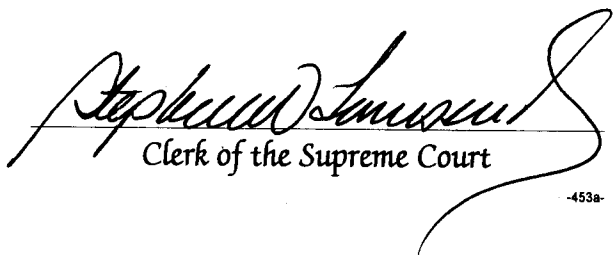
This is to certify that **BRIAN D LEE**
(No. **035531994**) was constituted and appointed an Attorney at Law of New
Jersey on **December 19, 1994** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
31ST day of January , 20 08


Clerk of the Supreme Court



Supreme Court of Pennsylvania

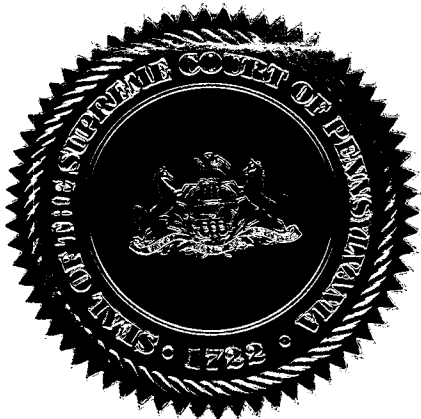
CERTIFICATE OF GOOD STANDING

Brian David Lee, Esq.

DATE OF ADMISSION

February 8, 1995

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: January 31, 2008

A handwritten signature in black ink, reading "Patricia A. Johnson".

Patricia A. Johnson
Chief Clerk

Lynelle J. Slivinski (LS 1210)
**OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.**
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lynelle.slivinski@ogletreedeakins.com

Attorneys for Defendants
Schwartzberg Associates, LLC, and
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**UNITED STATES DISTRICT COURT
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MICHELE CARUSO,

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v.

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Defendants.

Hon. Stephen C. Robinson, U.S.D.J.
Case No. 7:08-cv-00206-SCR

Civil Action

**AFFIDAVIT OF LYNELLE J.
SLIVINSKI, ESQ., IN SUPPORT
OF MOTION TO ADMIT BRIAN D. LEE,
ESQ., *PRO HAC VICE***

LYNELLE J. SLIVINSKI, ESQ., being of full age, avers and states as follows:

1. I am an attorney-at-law and of counsel of the law firm of Ogletree, Deakins, Nash, Smoak & Stewart, P.C., attorney for defendants Schwartzberg Associates, LLC and Cypress Administrative Services, LLC (improperly referred to by its former name Tamarac Administrative Services, LLC).

2. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of

defendants' motion to admit Brian D. Lee, Esq., as counsel *pro hac vice* pursuant to Local Rule 1.3(c).

3. I have been a member in good standing of the bar of the State of New York since 2000. I was also admitted to the bar of the United States District Court for the Southern District of New York in 2000, and am in good standing with this Court as well.

4. I have known Brian D. Lee, Esq., since January 2005.

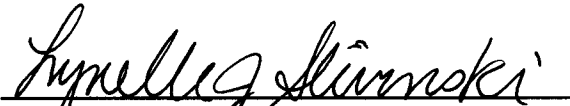
5. Mr. Lee is a shareholder of Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

6. I have found Mr. Lee to be a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure.


7. Accordingly, I am pleased to move the admission of Brian D. Lee, Esq., *pro hac vice*.

8. I respectfully submit a proposed order granting the admission of Brian D. Lee, Esq., *pro hac vice*, which is simultaneously filed herewith.

I hereby aver that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.


Lynelle J. Slivinski

Sworn to and subscribed
Before me this 6th day
of February, 2008


Notary Public

5454543.1 (OGLETREE)
Adele E. O'Remus
Notary Public of New Jersey
My Commission Expires March 31, 2010

Lynelle J. Slivinski (LS 1210)
**OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.**
521 5th Avenue, Suite 1700
New York, New York 10175
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lynelle.slivinski@ogletreedeakins.com

Attorneys for Defendants
Schwartzberg Associates, LLC, and
Cypress Administrative Services, LLC

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Defendants.

: Hon. Stephen C. Robinson, U.S.D.J.
: Case No. 7:08-cv-00206-SCR

: *Civil Action*

: **ORDER ADMITTING BRIAN D. LEE,**
: **ESQ., *PRO HAC VICE* PURSUANT TO**
: **LOCAL RULE 1.3(c)**

THIS MATTER, having come before the Court upon the application of
defendants Schwartzberg Associates, LLC and Cypress Administrative Services, LLC
(improperly referred to by its former name Tamarac Administrative Services, LLC) for
an Order pursuant to Local Rule 1.3(c);

IT IS on this _____ day of February 2008

ORDERED that Brian D. Lee, Esq., in good standing, be admitted as a visiting attorney, *pro hac vice*, to participate in all proceedings relative to the above-captioned matter.

SO ORDERED

Stephen C. Robinson U.S.D.J.

Lynelle J. Slivinski (LS 1210)
**OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.**
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New York, New York 10175
(212) 292-4314
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Attorneys for Defendants
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: **CERTIFICATE OF SERVICE**
: **(via overnight delivery)**

I am over the age of 18 and not a party to this action. On this date, I served a true copy of the following documents:

NOTICE OF MOTION TO ADMIT BRIAN D. LEE, ESQ., *PRO HAC VICE*;

AFFIDAVIT OF BRIAN D. LEE, ESQ., IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE*;

AFFIDAVIT OF LYNELLE J. SLIVINSKI, ESQ., IN SUPPORT OF MOTION TO ADMIT BRIAN D. LEE, ESQ., *PRO HAC VICE*; and

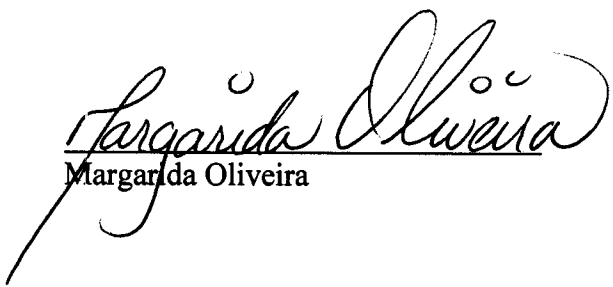
[PROPOSED] ORDER ADMITTING BRIAN D. LEE, ESQ., *PRO HAC VICE*.

on the party listed below, via prepaid overnight mail, sent to her attorneys of record at their last known addresses as follows:

David S. Halsband, Esq.
Halsband Law Offices
39 Hudson Street, 4th Floor
Hackensack, New Jersey 07601
Co-Counsel for Plaintiff

Michael Tsang, Esq.
Tsang Law Firm, P.C.
14 Wall Street, 22nd Floor
New York, New York 10005
Co-Counsel for Plaintiff

I declare under penalty of perjury that the foregoing statements made by me are true and correct.



Margarida Oliveira

Dated: February 6, 2008